



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
EDISON, NEW JERSEY 08837

271145



September 20, 1991

Mr. Mark Terril, P.E.  
PPG Industries, Inc.  
P.O. Box 2009  
4325 Rosanna Drive  
Allison Park, Pennsylvania 15101-2009

Re: Walton's Farm Site  
Administrative Order on Consent, Appendix 1  
Draft Site Operations Plan

Dear Mr. Terril:

Attached you will find the U.S. Environmental Protection Agency's (EPA) comments to the August 1991 Draft Site Operations Plan (SOP) prepared as Appendix 1 to the Administrative Order on Consent (AOC), issued to PPG Industries, Inc. by the EPA for the removal action at the Walton's Farm Site located in Delran Township, New Jersey. Please amend the SOP to reflect EPA's comments and resubmit the modified SOP to EPA for approval. The SOP modified as per EPA's comments will be considered "Final" upon signing of the Order by both PPG and EPA.

Please direct any questions regarding the comments on the Draft SOP to me at (908) 321-4345.

Sincerely yours,

Donald R. Graham, OSC  
Removal Action Branch

Attachments

RETAIN THIS NUMBER-CUSTOMER  
RECEIPT WILL BE MAILED TO YOU.

RB991352802 US

EPA Comments: Walton's Farm Draft Site Operations Plan

General:

- o If PPG chooses to address the sediments of the Rancocas Creek as discussed during our September 12 meeting; PPG will modify the existing SOP to reflect the forthcoming Biological Technical Assistance Group's (BTAG) comments. BTAG's comments are expected by September 24 and will be forwarded to you upon my receipt.
- o Although PPG has the authority to choose or change contractors, the SOP must explicitly state that any contractor selections are subject to EPA's approval.
- o Include provisions for repositioning of the fence in the event that sampling and analysis discloses additional areas of contamination.

SEE SHARI

2P. 1-6-1  
1.4.5 ?  
BTAG

NOT SO WHAT?  
ADDRESSED

Analytical:

A sufficient analytical data base does not presently exist which fully characterizes the waste and indigenous soils. Samples of the waste and adjacent "clean" area must be collected and analyzed for full TCL/TAL parameters as part of the Pre-removal Sampling and Analysis activities. Additionally, samples must be collected and analyzed for full TCL/TAL parameters upon completion of the waste removal activity. This pre-removal and post-removal sampling and analysis is necessary to fully characterize the waste and to verify completeness of the removal process.

- o The validation study for the field screening method (Section 4.2.6) should illustrate the correlation of DDD and DDE results with the compound (PCBs) for which methodology is intended.

FIELD SCREENING  
DELETED  
ENTIRELY

Health and Safety:

- o Please review Table 2 of the Health and Safety Plan (HASP). The recommended level for clothing appears to have been input incorrectly for excavation activity. vec required for
- o Modifications will be based upon updated characterizations of the material.

OK

Waste Material Handling:

- o Provide contingency measures for the possibility that the excavated material contains unforeseen contaminants and as such is not classifiable as a U060 or U061 waste.
- o All materials generated as a result of the pre-removal investigation and removal action will be properly contained, stored and analyzed prior to shipment to the designated off-site disposal facilities. The SOP must describe, in detail, the proper handling of all waste materials. Material will not be allowed to infiltrate on the site.
- o PPG shall provide EPA with all documentation relating to the disposal of any waste material generated on-site, including but not limited to manifests, Certificates of

2) DEV? HNU?  
3) OK

OK  
BUT  
NO  
POST REMOVAL

Destruction and LDR forms for hazardous materials and bills of lading for non-hazardous materials.

Site Support:

The decontamination pad described in the Removal Act Workplan shall be constructed prior to initiation of pre-removal investigation. There are currently no provisions for containing decon fluids generated during pre-removal activities.

Backfilling/Restoration:

Pursuant to discussions during our September 12 meeting, EPA will only require PPG to undertake measures necessary to eliminate erosion into the Rancocas Creek. PPG shall be in agreement with the land owner regarding all other backfilling and restoration activities, and keep EPA apprised of such discussions.

cc: P. Hick, EPA